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Attorneys for Plaintiff
JANET S, DENMAN

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JANET S, DENMAN,)	Case No.: 2:16-cv-00104-GMN-PAL
)	
Plaintiff,)	UNOPPOSED MOTION TO EXTEND
)	TIME TO FILE MOTION FOR
vs.)	REMAND AND/OR REVERSAL
)	
CAROLYN W. COLVIN, Acting)	
)	
Commissioner of Social Security,)	
)	
Defendant)	

Plaintiff Janet S. Denman ("Plaintiff") and defendant Carolyn Colvin, Acting Commissioner of Social Security ("Defendant"), through their undersigned counsel of record, hereby stipulate, subject to the approval of the Court, to extend the time for Plaintiff to file Plaintiff's Motion for Reversal and/or Remand to August 26, 2016; and that Defendant shall have 30 days or until September 26, 2016, to file her opposition, if any is forthcoming. Any reply by plaintiff will be due October 17, 2016.

An extension of time for plaintiff is needed due to a serious illness. The spouse of the associate in Counsel's firm who this matter is assigned is dealing with

1 his Spouse's terminal illness which has unexpectedly worsened in the last few
2 weeks. Subsequent to a surgical procedure on July 6, 2016 to remove tumors in
3 the spine/hip as a result of stage 4 breast cancer, Counsel's spouse was not
4 discharged until July 9, 2016 and then Counsel's spouse was re-admitted to the
5 hospital for 5 days on July 15, 2016 due to complications arising from the July 6th
6 surgery. Counsel's spouse was also recently admitted on August 1, 2016 and then
7 discharged on August 5, 2016, to provide treatment for intractable pain related to
8 the terminal illness. Counsel sincerely apologizes to the court for any
9 inconvenience this may have had upon it or its staff.

10 Counsel for defendant has indicated, via e-mail, that this motion to extend
11 the time to file is not opposed.

12 DATE: August 15, 2016, Respectfully submitted,

13 ROHLFING & KALAGIAN, LLP
14


15 /s/ *Marc V. Kalagian*

16 BY: _____
Marc V. Kalagian
Attorney for plaintiff JANET S, DENMAN
17

18 DATED: August 15, 2016 Daniel G. Bogden
19 United States Attorney

20 */S/ April A. Alongi

21 IT IS SO ORDERED this
22 23rd day of August, 2016.

23 
24 Peggy A. Leen
25 U.S. Magistrate Judge

26 April A. Alongi
Special Assistant United States Attorney
Attorney for Defendant
[*Via email authorization]